

4 APR
1979

MEMORANDUM FOR: Chief, Information Systems Analysis Staff

FROM:

SUBJECT: NAPA Committee Report

4. 2. On page 107 the NAPA committee recommended that policy issues be clearly identified in the regulations and revised only by the DCI, and that implementing procedures be the responsibility of the DDA or Director of Personnel. ~~We offer the following comments:~~

a. In most regulations there is a paragraph titled "Policy." Usually there are other paragraphs that separately incorporate "Responsibilities," "Procedures," and general introductory information. Other topic paragraphs such as definitions and authorities are included when needed. Therefore, it is possible to write a regulation and segregate policy from the rest of the material. As a practical matter, however, the paragraphs concerning responsibilities and procedures necessarily support and expand the policy statements in such a manner that they become extensions of the policy statements. Therefore, if the DCI assumes the role of approving policy changes in regulations, he should sign whenever there is a revision of any kind, except possibly for cosmetic changes such as updating titles. Handbooks, which are supposed to implement procedures, as a matter of rule could be signed by the DDA. Even in handbooks, however, it is necessary to include statements of policy and responsibilities just as some procedures are necessary in a regulation implementing policy.

b. It seems to us that if the DCI signs personnel regulations, why not the other regulations on logistics and security, for example? There appears to be no technical difference between the personnel regulations and the rest. The NAPA team recommendation, therefore, obviously raises the question of how the Agency is administered and who does it. In most organizations internal policy is signed by the person in charge. That the Agency regulatory system traditionally has operated on the basis of requiring total agreement before signature is at least an indication of who is not in charge. If the signing function were assumed by the DCI, even for only the personnel regulations, it very likely would be a confirmation of an essentially caretaker role for the DDA. All this might not immediately affect the regulatory system itself unless the DCI assumed the processing function as well; in which case it would strengthen coordination controls and greatly improve efficiency, whatever it does to the DDA.

2. On page 11, the committee expressed concern that policy changes have been effected through issuance of regulations without specific DCI/DDCI approval or even awareness. This comment assumes that significant Agency policy is made by publishing a regulation. ~~Of course it can be done that way if strictly enforced by top management.~~ Generally, however, Agency regulations reflect basic policy already established. ~~note the sizable DCI impact on personnel policy that is beginning to be reflected in the regulations.~~ Most coordination difficulties do not arise over great differences concerning momentous policy changes, but over procedures and at times over component attempts to lessen the impact of policy decisions on their own areas. Certainly there are many (if not most) regulations that get published without being seen by the DCI, but because of inertia in the system there will be few if any major policy changes made without DCI or DDCI involvement. ~~(No doubt the DCI would have greater control if he saw each change.)~~

3. We have one brief comment somewhat outside the NAPA recommendations on the regulatory system. By the tone of its report, it appears that the committee well recognizes the nonmanagerial role of the Office of Personnel. If the committee's recommendations were carried out, such a recordkeeping caretaker role would be further ingrained. Again we return to the question concerning the DDA and his directorate's role in administering the Agency. Perhaps the question already was answered long ago and the NAPA committee simply is confirming it.



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